

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DANIELLE PALLOTTA and CHERYL  
LAFLAMME, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

UNIVERSITY OF MASSACHUSETTS  
MEMORIAL MEDICAL CENTER, UKG  
INC., and KRONOS INCORPORATED,

Defendants.

Civil Action No.: 4:22-CV-10361-TSH

**UKG INC. AND KRONOS INCORPORATED'S  
NOTICE OF SETTLEMENT**

Defendants UKG Inc. and Kronos Incorporated respectfully submit this Notice to inform the Court of a recent class-action settlement impacting claims raised by Plaintiffs Danielle Pallotta and Cheryl Laflamme and state as follows:

1. On April 12, 2023, UKG executed a Settlement Agreement and Release (the “California Settlement”) with Plaintiffs William Muller, Antonio Knezevich, Adam Bente, and Cindy Villanueva (the “California Plaintiffs”) in the matter *In re UKG Inc. Cybersecurity Litigation*, Master Docket No. 3:22-cv-00346-SI (N.D. Cal.) (the “California Action”).

2. The claims asserted by California Plaintiffs in the California Action were based on the same December 2021 cybersecurity incident that gives rise to Plaintiffs’ claims here and the California Plaintiffs’ claims overlap with many of the claims made in this lawsuit.

3. The California Action was brought on behalf of a nationwide class of individuals whose data was stored in the Kronos Private Cloud at the time of the December 2021 cybersecurity incident that encompasses the class Plaintiffs seek to represent here.

4. Once approved, the California Settlement will release claims raised by Plaintiffs and the putative class in this action.

5. Defendants and the California Plaintiffs will file a motion for preliminary approval in the California Action by April 28, 2023, at which time Defendants will submit a copy of the Settlement Agreement to this Court.

Dated: April 13, 2023

Respectfully submitted,

UKG INC. and Kronos Incorporated

/s/ Alan Y. Wong

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non-registered participants on April 13, 2023.

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